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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

BENEDICT CAIOLA,

Civil Action No. 1:18-cv-11646-NRB

Plaintiff.

NOTICE OF RELATED CASE

v.

LOCKEY MAISONNEUVE, MELISA TROPEANO, and THE MTL COMMUNICATIONS GROUP LLC,

Defendants.

LOCKEY MAISONNEUVE,

Plaintiff.

v.

BENEDICT CAIOLA,

Defendant.

Civil Action No. 1:19-cv-02567-VEC

PURSUANT TO Local Civil Rule 1.6, Lockey Maisonneuve hereby gives notice that the above captioned actions currently pending before this Court are related in that they involve common parties and arise out of the same facts and circumstances.

Specifically, in October 2017, Lockey Maisonneuve and Benedict Caiola entered into an Investor Agreement wherein Caiola agreed to fund efforts to "realize the editing, design, publication, marketing and distribution of Maisonneuve's memoir entitled, A Girl Raised By Wolves. Pursuant to the Investor Agreement, Maisonneuve and Caiola retained a publicist: The MTL Communications Group, and its principal Melisa Tropeano. On June 5, 2018, Maisonneuve terminated the Investor Agreement on account of Caiola's fraud and breach. Every claim asserted in these two actions arises out of that commercial relationship among the parties and implicates the parties' respective rights and obligations under the Investor Agreement.

The action *Maisonneuve v. Caiola*, No. 1:19-cv-02567-VEC was commenced on June 26, 2018, in the New Jersey Superior Court, Union County; on September 17, 2018, Caiola removed the action to the United States District Court for the District of New Jersey; and on March 15, 2019, that court transferred the action to this Court.

The action *Caiola v. Maisonneuve, et al.*, No. 1:18-cv-11646-NRB, was commenced on December 13, 2018, and on January 14, 2019 was stayed pending the related proceedings then pending in the District of New Jersey. On December 14, 2018, Caiola filed a Notice of Related Case in that action, stating that these two actions are related. (*See* No. 18-11646, ECF No. 7.)

Dated: March 22, 2019 Respectfully submitted,

COOPER, LLC /s/Ryan J. Cooper

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